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**U.S. DISMANTLES MULTIMILLION-DOLLAR MONEY LAUNDERING
AND UNLICENCED MONEY TRANSFER ORGANIZATION**

DAVID N. KELLEY, the United States Attorney for the Southern District of New York, and WILLIAM KEZER, the Inspector in Charge of the New York Division of the United States Postal Inspection Service, announced the unsealing of a criminal Complaint and the arrests today of 10 members of a network of individuals in five different cities across the United States who have allegedly engaged in a multi-million dollar conspiracy to launder the proceeds of sales of counterfeit goods and remit millions of dollars to foreign countries without the licenses - or oversight - required by federal and state laws.

Today's arrests represent the culmination of an almost two-year investigation by the United States Postal Inspection Service. In addition to money laundering and unlicensed money remitting, Postal Inspectors also obtained evidence that some of

the targets allegedly produced and transferred fraudulent identification documents for illegal immigrants.

Arrested today in New York City were JACOB JAH, JAH's wife, MARIANNE KANE, MADJA DJA, YAYA DIA, BELAL SOW, and IBRAHIMA GUEYE; arrested in Columbus, Ohio was EL HADJ BABA LY; arrested in Detroit, Michigan was ASSANE CISSE; arrested in Memphis, Tennessee was OUSMANE DIALLO; and arrested in Denver, Colorado was MAMADOU KANE. Two additional defendants, SILEYE DIA and MAMADOU DIA, are being sought.

Evidence developed in the investigation allegedly revealed that members of this network (the JAH ORGANIZATION) allegedly trafficked in counterfeit goods, produced false identification documents, laundered the proceeds of those illegal activities, and conducted an unlicensed money transmitting business to send those proceeds through the United States mail to individuals in Michigan and Ohio who maintained bank accounts at United States banks, from which millions of dollars were wired to various entities located in, among other places: China, Hong Kong, Vietnam, the United Arab Emirates, India, Thailand, and Belgium.

Sales of Counterfeit Goods

According to the Complaint, MADJA DJA and BELAL SOW operated a business located at 1225 Broadway in Manhattan from which they and others sold counterfeit merchandise such as handbags, accessories, and DVD/VCR movies. On several occasions in

March and April 2004, IBRAHIMA GUEYE and MADJA DJA sold to a confidential informant counterfeit handbags, purporting to be manufactured by "Fendi" and "Louis Vuitton" among others, from IBRAHIMA GUEYE and MADJA DJA. The Complaint further charged that DJA and SOW regularly sent large packages through the United States mail to a location in Memphis, Tennessee. Mail carriers in Memphis reported that this location, 1340 Dove Flight Lane, regularly received large packages and on occasion, CD's, DVD's and videocassettes were observed inside broken packaging.

Further to the Complaint, wire interceptions also revealed that JACOB JAH and his coconspirators were allegedly in the business of selling unauthorized copies of motion pictures.

**Bank Accounts Used for Money Laundering and
Unlicenced Money Transmitting Business**

According to the Complaint, defendants JACOB JAH, MARIANNE KANE, MADJA DJA, BELAL SOW, MAMADOU DIA, YAYA DIA, SILEYE DIA, MAMADOU KANE, and EL HADJ BABA LY operated numerous bank accounts into which were funneled not only the proceeds of their illegal activities, but also hundreds of thousands of dollars collected from individuals throughout the United States who wished to send money in a manner that would evade detection by the federal authorities to whom legal banking institutions are required to report. The defendants allegedly deposited these proceeds into

bank accounts—registered under corporate names such as “Express Money Transfer,” “A&B Financial Services,” and “Dialy Trade Center”—at United States banks in Columbus, Ohio, and Detroit, Michigan. From there, per the Complaint, the funds were wired to entities in foreign countries, including the United Arab Emirates, China and India.

According to the Complaint, the defendants transmitted over fifteen million dollars over the past year from their Columbus bank accounts alone.

False Identification Documents

According to the Complaint, JACOB JAH and ASSANE CISSE conspired in or about April 2004 to produce and transfer a false Resident Alien card using another individual’s identity. In a phone call intercepted pursuant to a judicially authorized wiretap, JAH and CISSE expressed some confusion about how much to pay their associate who prepared the false identification document, because normally “he” prepares more than one at a time.

If convicted of these charges, the defendants will be subject to the following maximum penalties:

Defendants	Charge	Maximum Sentence
JACOB JAH MADJA DJA BELAL SOW	18 U.S.C. § 1956(h) [Money- Laundering]	20 years’ imprisonment; fine of the greatest of \$500,000 or twice the value of laundered funds; 5 years’ supervised release

JACOB JAH MARIANNE KANE MADJA DJA BELAL SOW MAMADOU DIA YAYA DIA SILEYE DIA MAMADOU KANE EL HADJ BABA LY OUSMANE DIALLO	18 U.S.C. § 1960 [conducting an unlicensed money transmitting business]	5 years' imprisonment; \$250,000 fine; 3 years' supervised release
MADJA DJA BELAL SOW IBRAHIMA GUEYE	18 U.S.C. § 371 [conspiracy to traffic in counterfeit goods]	5 years' imprisonment; \$2,000,000 fine; 3 years' supervised release
JACOB JAH ASSANE CISSE	18 U.S.C. § 1028 [production and transfer of false I.D. documents]	15 years' imprisonment; \$250,000 fine; 3 years' supervised release

JACOB JAH, MARIANNE KANE, YAYA DIA, MADJA DJA, BELAL SOW, and IBRAHIMA GUEYE are all expected to be presented later this afternoon before United States Magistrate Judge James C. Francis, IV, in Manhattan federal court.

Similarly, prior to their eventual appearance in Manhattan federal court in the coming weeks, other defendants are expected to be presented before United States Magistrate Judges in their respective cities today. EL HADJ BABA LY is expected to appear before the Chief Magistrate Judge Norah McCann King in

federal court in Columbus, Ohio. MAMADOU KANE is expected to appear before the Hon. Michael J. Watanabe in federal court in Denver, Colorado. OUSMANE DIALLO is expected to appear before the Hon. Diane K. Vescovo in federal court in Memphis, Tennessee. ASSANE CISSE is expected to appear before the Hon. Steven D. Pepe in federal court in Detroit, Michigan.

Mr. KELLEY praised the efforts of the United States Postal Inspection Service, the Department of Homeland Security's Bureau of Customs and Immigration Enforcement (BICE), the New York City Police Department (NYPD) and its Organized Crime Investigations Division, and the Motion Picture Association of America.

Assistant United States Attorneys MIRIAM H. BAER and STEPHEN A. MILLER are in charge of this prosecution. Assistant United States Attorney MARC LITT is in charge of the forfeiture aspects of this prosecution.

The charges in the criminal Complaint are merely accusations, and the defendants are presumed innocent unless and until proven guilty.